

www.dachenglaw.com

DaCheng Law Offices, LLP

2 Wall St, 21st Floor

New York, New York 10005

Tel: 1.212.380.8388

Fax: 1.212.810.1995



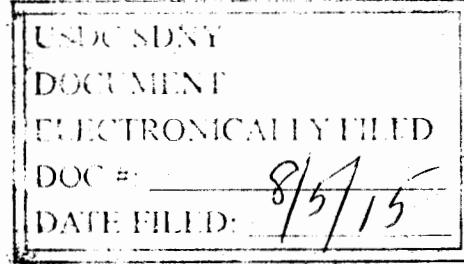
DACHENG
LAW
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大成律师事务所

August 4, 2015

VIA FASCIMILE

Hon. Victor Marrero
United States District Court, Southern District of New York
Suite 660
United States Courthouse
500 Pearl Street
New York, New York 10007
(212) 805-6382



Re: Euro Pacific Capital Inc. v. Bohai Pharmaceuticals Group Inc.
Case No.: 15 Civ. 4410 (VM)

Dear Judge Marrero:

This office represents the defendant, Bohai Pharmaceuticals Group, Inc. ("Bohai"), in the above-referenced matter. We had previously written to the Court on July 13, 2015 seeking an extension of time on behalf of Bohai to respond to plaintiff's complaint. Bohai requested the extension to retain litigation counsel and consult with such counsel to prepare a meaningful response. On consent, the Court granted Bohai's request and extended the deadline to file a response to plaintiff's complaint to August 13, 2015 (Doc. No. 7 and 8).

On August 3, 2015, Bohai selected this office to represent them in this lawsuit as defense counsel, and, this morning, a notice of appearance was filed on behalf of the defendant. Bohai's operations are in China and its representatives reside and work in China. Therefore, in order to complete our firm's deliberate investigation of the plaintiff's claims and to prepare and file an appropriate response, Bohai requests additional time. As a result of personal and professional commitments of Bohai representatives and undersigned counsel, we seek an additional 21-day extension of time up to and including **September 3, 2015**, to file a response to the complaint.

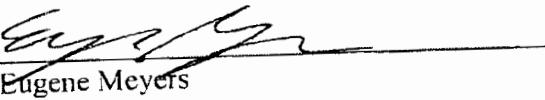
As noted above, this is Bohai's second request for an extension of time. However, we note that this firm was engaged to act as litigation counsel just this week and the additional time would not unduly prejudice the plaintiff as a scheduling order has yet to be entered in this case. Plaintiff's counsel has indicated that they do not consent to this request on the sole basis that they had previously consented to the initial extension.



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Respectfully submitted,

DACHENG LAW OFFICES L.L.P.
*Counsel to Bohai Pharmaceuticals Group,
Inc.*



Eugene Meyers

2 Wall Street, Floor 21
New York, New York 10005
Tel: (212) 380-8388
Fax: (212) 810-1995
E-mail: Eugene.Meyers@dachenglaw.com

cc: Christopher Lewis Ayers (via facsimile)
(212) 278-1733

Request GRANTED. The time for defendant(s) to answer or otherwise move with respect to the complaint in this action is extended to <u>9-3-15</u> .	
SO ORDERED.	
8-5-15	VICTOR MARRERO, U.S.D.J.
DATE	

